

# **Exhibit D**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**OCLC, INC.,**

**Plaintiff,**

**v.**

**Baker & Taylor, LLC; Bridgeall Libraries  
Ltd.,**

**Defendants.**

**Case No. 2:25-cv-00309**

**Judge Edmund Sargus, Jr.**

**Magistrate Judge Elizabeth Preston  
Deavers**

**PROPOSED NOTICE OF DEPOSITION**

Pursuant to Federal Rule of Civil Procedure 30(b)(6), counsel for Plaintiff OCLC, Inc. (“OCLC”) will take the deposition of the designated representative(s) of Defendant Bridgeall Libraries Ltd., beginning at 9:00 a.m. on [DATE], 2025 at a location agreed upon by the parties. OCLC will take the deposition of the designated representative(s) on the matters below and on reasonably related matters from day to day until completed. The deposition will be taken before an officer appointed or designated to administer oaths and will be transcribed by stenographic means. This deposition is being taken for the purposes of discovery, for use at the preliminary injunction hearing, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure and the local rules.

**MATTERS UPON WHICH TESTIMONY IS SOUGHT**

1. Defendants’ corporate structure, including Defendants’ subsidiaries, affiliates, and related entities and those entities’ involvement in the development, strategy, design, operation, implementation, and/or oversight of BTCat;

2. Agreements between Bridgeall, or any of its affiliated entities, and their customers, including any agreements that include a provision requiring access to and/or a license to use the customer's cataloging records and any third-party cataloging agreements; and the strategies behind these agreements;
3. Your knowledge and understanding of WorldCat records and data, OCLC's Framework Agreement, OCLC's WorldCat Rights & Responsibilities for the OCLC Cooperative, and OCLC's prior efforts to protect WorldCat through litigation and other means;
4. Your access to and use of WorldCat records and data, including but not limited to Your use of WorldCat records and data in BTCat, collectionHQ, and Your other products and services;
5. The allegations and claims asserted in the Complaint filed in this litigation;
6. Any of Your discovery responses to the requests served concurrently with this notice and any documents produced in response to those requests; and
7. Any harm to Bridgeall that Defendants assert would result from OCLC's requested injunction.